Exhibit B

Subject:

RE: Polysciences v. Masrud

Date:

Thursday, November 12, 2020 at 1:22:14 PM Eastern Standard Time

From:

Spota, Cali R.

To:

Julianne Peck

CC:

Reed, Eric E., Daroci, Steven J., Norton, Gerard P., Lagarenne, Jonathan R.

Attachments: image003.png, image005.png

Juli,

As stated in Paragraph 18 found on page 4 of Polysciences' Objections and Responses to Mr. Masrud's Second Request for Production, Polysciences objected to the time period requested for production. As further stated in this paragraph, Polysciences agreed to undertake a good-faith review of its records and anticipates that production will commence on a rolling basis within 45 days. I believe this should address your concerns.

Best regards,

Cali

Cali R. Spota
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(609) 844-7437 - direct
(609) 896-1469- fax
cspota@foxrothschild.com
www.foxrothschild.com

From: Julianne Peck <jpeck@homanspeck.com> Sent: Thursday, November 12, 2020 1:06 PM To: Spota, Cali R. <cspota@foxrothschild.com>

Cc: Reed, Eric E. <EReed@foxrothschild.com>; Daroci, Steven J. <sdaroci@foxrothschild.com>; Norton, Gerard

P. <GNorton@foxrothschild.com>; Lagarenne, Jonathan R. <jlagarenne@foxrothschild.com>

Subject: [EXT] Re: Polysciences v. Masrud

Cali,

Polysciences' deadline to produce documents responsive to Masrud's Second Request for Production was yesterday and yet not a single document was produced and no extension was requested. Please let me know when Polysciences intends to produce the documents that it has indicated will be produced in response to the Second Request for Production.

Thank you, Juli